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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

12 PAULINE SANTA CRUZ,

Case No.: 3:21-cv-00256-LRH-CLB

13 Plaintiff,

14 vs.

**MOTION TO EXTEND DISCOVERY
PLAN AND SCHEDULING ORDER**

15 FEDERAL EXPRESS CORPORATION,

(FIRST REQUEST)

16 Defendant.
17
18 _____ /

19 Plaintiff by and through her attorneys, hereby respectfully request the Discovery Plan and
20 Scheduling Order in the Joint Case Management Report dated August 16, 2021, (ECF No. 24.), be
21 revised and extended 60 days. This extension is requested due to counsel for Plaintiff having a
22 few COVID scares which caused the office to shut down and an emergency medical situation with
23 a staff member. This extension would allow counsel for Plaintiff additional time to conduct
24 remaining depositions. The extension is not brought for any improper purpose or undue delay.

25 This Motion is unopposed by counsel for Defendant.

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2. Dispositive Motions: The March 30, 2022 date for filing dispositive motions shall be extended approximately 60 days up to and including **May 30, 2022**, approximately thirty (30) days after discovery cut-off. Exactly 60 days lands on a Sunday.

DATED this 3rd day of February, 2022.

Mark Mausert
Sean McDowell
729 Evans Avenue
Reno, NV 89512

Dated: February 4, 2022

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CERTIFICATE OF SERVICE

I hereby certify, under penalty of perjury that I am an employee of Mark Mausert and Sean McDowell, Esq.; I am over the age of eighteen (18) years; I am not a party to, nor hold an interest in this action; and on the date set below, I sent via the electronic filing system maintained by this court, a true and correct copy of, **MOTION TO EXTEND DISCOVERY PLAN AND SCHEDULING ORDER**, to the addressee(s) listed below:

Brandon Pettes
Christopher Ahearn
FedEx Express
Brandon.pettes@fedex.com
Christopher.Ahearn@fedex.com

Karyn Taylor
Littler
KMTaylor@littler.com

DATED this 3rd day of February, 2022.

/s/ Brittany Martin
Brittaney Martin
Employee of Mark Mausert &
Sean McDowell